

**2022 Sounder  
Commuter Rail  
Internal Safety Audit**  
Report # 2022-15

**Audit Report**



**Sound Transit Audit Division**

December 23, 2022

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# Abbreviations

AED	Automated External Defibrillator
APP	Accident Prevention Plan
APTA	American Public Transportation Association
ASP	Agency Safety Plan
BNSF	BNSF Railway Company (Formerly Burlington Northern and Santa Fe)
CAP	Corrective Action Plan
FRA	Federal Railroad Administration
GCOR	General Code of Operating Rules
GHS	Globally Harmonized System
JRSC	Joint Rail Safety Committee (Sounder Commuter Rail)
MOW	Maintenance-Of-Way
NTD	National Transit Database
PDB	Point Defiance Bypass (the 11-miles between Nisqually and Lakewood) (also referred to as the Lakewood Sub-Division or corridor)
PPE	Personal Protective Equipment
PTC	Positive Train Control
PTCSP	Positive Train Control Safety Plan (BNSF)
ROW	Right-Of-Way
SAIR	Safety Action Item Request (Hazard Log and Corrective Action Plan Log)
SCR	Sounder Commuter Rail
SHOP	Safety Hazards Oversight Panel
SMS	Safety Management System
SOP	Standard Operating Procedure
SSMP	Safety and Security Management Plan
SSP	System Safety Program
ST	Sound Transit (Central Puget Sound Regional Transit Authority)
SWI	Stacy and Witbeck, Inc.
TR	Tacoma Rail
TY&E	Train, Yard and Engine

# Executive Summary

Sound Transit’s Audit Division performed this modal safety audit to ensure the agency succeeds in its systematic approach of operating the Sounder Commuter Rail (SCR) and responds to changing system conditions and the needs of our passengers.

The purpose of this audit was to independently review, evaluate, and ensure that Sound Transit and our contracted operating partners comply with System Safety Program (SSP) requirements. The audit team used a risk-based approach to identify SSP audit topics under review during this cycle. Additionally, we examined how Sound Transit management and partner agencies effectively addressed risks and opportunities in business processes and strategic direction, ultimately ensuring the safe operation of Sounder Commuter Rail.

The scope of this audit covered documentation reviews, on-site field observations at agency and partner agency locations for operations & maintenance, verification of process and procedures, and staff interviews; all of which to determine and support our audit findings and observations.

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**The Audit Division is an independent assurance function that improves how the agency is operated and managed, ensuring public funds are managed transparently, and ultimately keeps employees, contractors, and our riding public safe.**

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# Results Summary

It was clear to the audit team that Sound Transit and each operating partner is committed to the highest standards of safety, as we observed this throughout the audit in the operating environment and in maintenance.

Based upon our review, we conclude that critical safety controls for Sounder Commuter Rail are in place. **As a result of this audit, we identified one (1) finding and two (2) observation with recommendations.** These are explained further in this report, including requirements and timelines for identified responsible parties to respond to these audit results.

The audit team completed its review and identified areas where either processes and procedures exist and were not followed, or where they did not exist but should have. This report does not include areas where procedures exist and were properly followed, unless the audit team must highlight or bring attention to a specific best practice

# Audit Work and Scope

Sound Transit’s Compliance Audit group performed this annual internal safety audit in accordance with 49 CFR Part 270.303

The audit team performed document reviews, interviews, and conducted field visits to assess the overall conditions and adherence to federal, state, and local standards. All audit activities were coordinated with Amtrak and ST Transportation Safety & Security staff before the audit kick-off meeting and during our 2-week audit process.

Due to the COVID-19 pandemic, all Compliance Auditors followed agency COVID Return-to-Work processes, completed necessary COVID-19 Safety Training, and ensured they had executive approval to be at Sound Transit locations before commencing this audit. The team wore all required Personal Protective Equipment (PPE) as prescribed by the Sound Transit Safety Department to keep them safe from incidental COVID exposure.

The audit began with a “Kick-off” meeting to introduce the audit team, review the scope and schedule, and address any concerns before conducting interviews. After the audit fieldwork phase, a closeout meeting took place to provide stakeholders a summary of the results to review and act upon before the final Audit Report.

Audit Activity	Date(s)
Issuance of Audit Notification Letter:	Sept 7, 2022
Audit Kick-Off Meeting:	Oct 6, 2022
Audit Interviews:	Oct 7-20, 2022
Field Observations:	Oct 14, 2022
Audit Close-out Meeting:	Oct 20, 2022

## Objectives

Our objective was to ensure Sound Transit and its contracted partners are compliant to Safety Management System (SMS) guidelines, as well as the System Safety Plan. The audit team used a risk-based approach to identify safety management system audit topics under review during this cycle. Furthermore, this audit covered the second year of our three-year audit cycle as required by the Agency Audit Plan.

Additionally, the audit sought to determine if ST Safety and Sounder Commuter Rail processes and procedures meet federal, state, and local requirements, internal processes, and other self-imposed requirements applicable to the standard being audited. Additionally, this audit will inform the agency of potential gaps in processes to improve the agency’s SMS implementation.

## Scope

The scope of this audit focused on the application and verification of safety plans and programs documented as part of the SSP. The audit follows the 3-year audit cycle, which fulfills the requirements from the FRA and Audit Division processes. The scope of the audit evaluated portions of each component of the SSP as pre-determined by the 3-year audit plan.

- ✓ 49 CFR Part 270.303
- ✓ ST System Safety Plan
- ✓ State/Federal and Local Regulatory Requirements

The audit included a variety of methods of verification, including interviews with ST Safety, Sounder senior management, and Amtrak Safety personnel. We conducted document reviews of the safety program procedures, reportable safety data, Sounder Commuter Rail's Corrective Action log (SAIR Log), hazard assessments and performance data. Additionally, we reviewed training documentation, operating and maintenance rules and bulletins.

Additionally, the audit team conducted on-site field observations at Amtrak Holgate rail yard. These reviews included observation of safety practices and procedures for operations and maintenance and inspection of newly delivered cab and coach cars. If we discovered any issues that posed an immediate safety concern, we made management aware to take appropriate actions.

Lastly, we reviewed previous audit results and performed follow-up on any open findings and observations; the results of which are expanded upon further in the report.

For any items we could not verify during this audit, we will continue to monitor these items as part of the Audit Division's monitoring and follow-up process.

We sought to verify the Agency's process for addressing risk, mitigation, and continual improvement of the SSP as outlined in the FRA 49 CFR Part 270.

## Source Documents

The auditors requested and reviewed program policies and procedures as part of audit pre-work. The primary source document was the Sounder Commuter Rail System Safety Plan Program (SSP), Revision 1.0, August 2021. FRA 49 CFR Part 270 requirements also served as a basis for minimum program requirements. After we completed interviews, we also collected supplemental documentation to verify processes we identified during the fieldwork portion of the audit.

Any documents we reviewed were retained as audit evidence to support any observed conformance any issues. A complete list of all documents we reviewed and received is available in Appendix D of this report.



# Summary of Results

## Positive Practices

The audit team recognized Sounder Operation’s excellent partnership with BNSF, Amtrak, and Stacy Witbeck Inc. (SWI). Each agency is incredibly focused on collaborating with Sound Transit, with a focus on both safety and the quality of service. As we interviewed each agency, they thoroughly mentioned that they treat our trains, right of way, and service as their own. Each partner agency strives to provide the best service possible.

The audit team also recognized ST Transportation Safety and Security Division’s leadership in ensuring a robust safety program for Sounder Commuter Rail and making efforts towards the implementation and continual improvement of the System Safety Program (SSP).

As a follow-up to the 2021 Sounder Commuter Rail internal safety audit, the audit team observed automated external defibrillators (AEDs) on Sounder rail cars during the field visit portion of the audit. During the prior audit, expired shock pads on an AED were discovered. This cycle, we confirmed that all AEDs have since been inspected, and all expired AED shock pads have been replaced, as required.

## Summary of Findings and Observations

Overall, our audit resulted in **one (1) finding and two (2) observations with recommendations** relating to Safety Risk Management and Safety Assurance portion of the SSP.

The following table summarizes findings and observations identified from this audit.

Audit Review Area	Number of Findings	Number of Observations
<b>SSP 0.0 Introduction</b>	0	0
<b>SSP 1.0 Safety Plan (includes 40 CFR Part 270 Compliance)</b>	0	0
<b>SSP 2.0 Safety Management Policy</b>	0	0
<b>SSP 3.0 Safety Risk Management</b>	0	1
<b>SSP 4.0 Safety Assurance</b>	1	1
<b>SSP 5.0 Safety Promotion</b>	0	0

# Audit Results

This section goes into further detail on what we found within the scope of this audit.

## 0.0: Introduction

We reviewed the System Safety Plan (SSP) to ensure the Introduction and each sub-component are aligned and accurately describe the agencies background and function and establishes accountability and responsibility at top levels. Additionally, the audit team reviewed agency organizational charts, ensured the system description matched the current state of operations and expected outcomes of SMS are listed, tracked, and reported as required.

Updates of SSP are a collaborative effort between Safety, Sounder Operations, and partnering agencies. Periodic meetings occur with the FRA to review any new regulations for consideration. There is an annual training with the FRA and regular visits to the SRC system by the FRA and Washington Utilities and Transportation Commission.

**Our review of SSP 0.0 implementation resulted in no (0) findings and no (0) observations with recommendations.**

### 0.1 ST Background

The SSP defines the characteristics and operating environment, of the Sounder system and identifies critical facilities, equipment, and other assets owned by both Sound Transit and by its partner agencies.

### 0.2 Management and Organizational Structure

No new roles, titles, or functions are updated before the final second SSP revision is signed. The SSP references SMS throughout the document and upholds the ST CEO as the authority of accountability. The SSP also supports the CSO as the delegation of authority.

The SSP mentions the SCR Organization Chart in Appendix 3. SCR keeps the Organization Chart in SharePoint and updates the chart on an as-needed basis. The ST HR department updates the SCR Organization Chart accordingly, and ST Document Control will update SCR materials at least once annually. SWI provides SCR with their Organization Chart as a requirement. BNSF updates its Organization Charts every six and 12 months and provides the information to SCR. Amtrak updates its Organization Charts when changes take place and will give SCR new charts with updates.

### 0.3 Goals and Objectives

The Joint Rail Safety Committee (JRSC) establishes goals and objectives annually. The JRSC is comprised of representatives from stakeholders including Amtrak, BNSF, ST Operations, ST Security, ST Emergency Management, and ST Safety. Progress on goals is reviewed and discussed at JRSC meetings.

The JRSC will review goals for discussion and adopt the new goals when the committee agrees. The goals include elements from the FRA and APTA and On-Time Performance

for SCR service. JRSC reviews plans monthly, and annual modification will update goals for the following year and mention completed goals.

The next SSP revision will include updated goals as measurements to improve SCR service. To verify goals and objectives are reviewed by the JRSC, the audit team conducted interviews with Director Commuter Rail Bus & Paratransit, Deputy Director Commuter Rail Operations, and Sr Transportation Safety & Security Specialist and reviewed JRSC meeting minutes from Jan thru Sep 2022.

## 1.0 Safety Plan

**Our review of SSP 1.0 implementation resulted in no (0) findings and no (0) observations with recommendations.**

### 1.1 Conformance to FRA Rules & Requirements-

The SSP and its upcoming revision meet all FRA program standards. Before the SSP, the SSPP was the governing document for SCR. The SSP is a significant overhaul and incorporates the program's new 49 CFR 270 regulations and structure. Interviews with Deputy Director of Sounder Operations and the ST FRA Reporting Officer and the review of monthly FRA reports from Jan-Jun 2022 and ST TSS Standard Operating Procedure for FRA reporting confirm ST meets the requirements set by FRA and CFR 270.

## 2.0 Safety Management Policy

**Our review of SSP 2.0 implementation resulted in no (0) findings and no (0) observations with recommendations.**

### 2.1 Policy Statement and Authority

The audit team reviewed and confirmed that the policy and authority statement specific to the authority of the Sounder SSP is approved by the ST Chief Safety Officer and is current as of issue of the current SSP Revision 1.0 in August 2021. Additionally, the SSP references the agency's Policy Statement and the R2017-13 Board resolution.

### 2.3 Plan Implementation

The SCR SSP Implementation Plan consists of coordination from ST Operations, Safety, Human Resources, and the primary contractors for SCR Services including BNSF, Amtrak, and SWI. We interviewed the Director, Commuter Rail Bus & Paratransit, Deputy Director, Commuter Rail Operations, and Sr. Transportation Safety & Security Specialist and reviewed JRSC monthly meeting minutes and the FRA SSP approval letter to verify SSP implementation.

Milestones have been developed and full implementation scheduled for end of year 2024.

## 3.0 Safety Risk Management

**Our review of SSP 3.0 implementation resulted in no (0) findings and one (1) observation with recommendations.**

### 3.1 Risk Based Hazard Management

As described in the SSP, the ST Chief Safety Officer and the ST Director of Commuter Rail, Bus and Paratransit jointly share in the ultimate responsibility or implementation of a risk-based hazard management program for Sounder. Hazards are tracked on the SAIR log and are reviewed at JRSC meetings. Once corrective actions have been taken, the effectiveness of mitigations is reviewed and reported to the JSRC, as necessary. The audit team performed review of the JRSC meeting minutes from Jan-Sep 2022 and the SAIR log current as of Sep 2022 to verify tracking of hazards.

SCR's SharePoint site now has data from a QuickBase database and is reviewed regularly. Also, the MBR (Management Business Review) is conducted monthly for the department and regularly discussed for status, progress, areas for improvement, and trends. SCR collects data on rolling stock defects (i.e., doors, brakes, electrical, etc.). Any trends identified issues would be a focus for improvements. The audit team reviewed maintenance tracking data and audit reports from Jan-Sep 2022.

During a field visit to the Holgate yard, the audit team inspected newly delivered Alstom coaches and cab cars. The new rolling stock is equipped with wheelchair lifts at all doors, as shown in Figure 1 Through interviews with Deputy Director, Commuter Rail Operations it was unclear whether crews have received training on the wheelchair lifts. **(See Observation #1).**



**Figure 1.** Alstom coach wheelchair lift

## 4.0 Safety Assurance

The audit team's review of SSP 4.0 implementation resulted in **one (1) finding and one (1) observation with recommendations.**

### 4.1.3 Internal Safety Audit

Although not captured during the fieldwork portion of the audit, the Compliance Audit group did not follow established procedures of providing the draft "2022 Sounder Internal Safety Audit Report" to agency leadership and audit responsible parties within established timeframes **(see Finding #1).**

### 4.3 Accident and Incident Reporting and Investigation

We reviewed interagency communications, procedures and plans relating to accident and incident notifications and investigation. The agency has a designated FRA Reporting Officer within the Transportation Safety & Security Division. Compliance to reporting requirements to FRA under 49 CFR Part 225 will be reviewed in future internal audits of SCR.

We sampled incident reports from Jan-Sep 2022 including, near miss, pedestrian strikes, mechanical cancellations, and vehicle strikes. Additionally, we reviewed Sounder Safety

Incident Notification Procedures and After Action Debrief procedures. After the review of these reports, we determined ST TSS and Sounder Ops are compliant with FRA reporting requirements.

ST safety oversight is provided on site by the SCR Superintendent Maintenance of Way. There is strong awareness of FRA requirements for accident and incident reporting. However, it is unclear that ST MOW staff and contractors receive annual training of ST incident reporting procedures. **(See Observation #2)**

## 5.0 Safety Promotion

**Our review of SSP 5.0 implementation resulted in no (0) findings and no (0) observations with recommendations.**

### 5.1 Safety Culture

The audit team conducted a Safety Management Audit to include SMS Implementation in September 2022. The objective of this audit was to identify gaps in the agency's SMS implementation and conformance to ISO 45001 standards. Outcomes from this audit are tracked by ST TSS and ST Audit to ensure mitigations are in place to continue building a positive safety culture. Results from this audit are available upon request.

To assess how safety culture is assessed and measured at Sound Transit, we interviewed the Deputy Director of Transportation Safety & Security, Manager of Security & Safety Management Systems. In addition to interviews, we reviewed the following documents to assess how the safety culture is measured:

- ST Safety Culture Survey Results 2022
- Public Transportation Safety Certification Training Program Refresher
- *The most current* SMS Implementation Smart Sheets
- ST HUB Safety articles/Daily Safety Message process

Through interviews and document review, we determined that ST is following its SMS implementation plan and is continuing to build a robust safety culture. For example, daily safety messages have become a norm for all formal meetings, safety articles are located on the ST HUB for employees to reference.

## Conclusion

Based on document reviews, interviews conducted, and field observations, we conclude that Sound Transit, and partner agencies are committed to the highest standards of safety and that continuous improvement efforts from this audit will help improve safety controls.

Sound Transit fully relies on its partnering agencies to operate, maintain, and oversee their safety management systems. ST Safety and Operations have established relationships with each agency to ensure they are informed and up-to-date on all issues concerning the safety and reliability of Sounder Commuter Rail.

Overall, we appreciate the transparency and cooperation of all Sound Transit and partner partnering agencies who contributed to this audit.

## Findings & Observations

All findings and observations are outlined further in the attached Appendix A.

### Next Steps

For the items raised, the Audit staff will work with the Safety staff to determine the party responsible for addressing the finding's root cause and mitigations. The party's responsible for corrective actions will be provided with the appropriate response form, and they will be required to use this form to submit a proposed Corrective Action Plan **14 days** upon issuance of the Final Audit Report.

### Definitions:

- a. **Findings** are requirements where Sound Transit is non-compliant with a policy, procedure and/or regulation and must be corrected, and documented in writing on a corrective action plan. Action plans should also include a specific, measurable amount of time it will take to reduce the risk rating and correct the issue.
- b. **Observations with Recommendations** does not mean the issue is deficient, however, the auditor has determined that the issue poses the potential risks of becoming a finding in the future if recommended changes are not put in place to prevent occurrence.

For Observations with Recommendations, responders are not obligated to complete the recommended actions because the identified issue is compliant but are still required to submit the Observation with Recommendations Form. Action plans must be submitted within **30 days** of the distribution of this report.

Recommendation responses shall be sent back using the template response format provided and will be tracked, verified, and if necessary, escalated to achieve satisfactory closure to prevent recurrence.

For recommendations, acceptable responses include:

- (1) Accepted
- (2) Accepted with Modification (include modification description) or
- (3) No Action Taken with Justification (include justification explanation and evidence) and changes are not made to prevent a future reoccurrence.

## Appendix A: Findings & Observations Table

The following table summarizes the findings and observations listed in the audit report. Please refer to **Appendix B: Audit Hazard Risk Rating Process** for more information.

The table below provides space for the responsible party to respond to each finding and observation. Once received and approved by the appropriate authority, the Audit Division will periodically follow up to ensure that the mitigations are put in place to the identified concerns. Additionally, we will collect and document objective evidence for verification and closure purposes.

### Finding(s):

There was one **(1)** Finding associated with this audit.

Finding #1	4.0 Safety Assurance	4D
<p><b>Finding:</b> Although not captured during the fieldwork portion of the audit, the Compliance Audit group did not follow established procedures of providing the draft “2022 Sounder Internal Safety Audit Report” to agency leadership and audit responsible parties within established timeframes.</p> <p><b>Responsible Party:</b> ST Audit Division</p> <p><b>Reference:</b> Internal Safety Audit Procedure SA-01, Paragraph 6.5</p>		

## Observations with Recommendations:

This audit resulted in two (2) Observation with Recommendations where if not addressed have the potential to become a finding in the future.

### Safety Risk Management: 3.1.1 Safety Risk Identification

**Observation #1:** During interviews with the Deputy Director Commuter Rail Operations and document review, there is no evidence SCR crews have conducted training on the use of wheelchair lifts on the new newly delivered Alstom coaches and cab cars.

**Recommendation:**

Develop and conduct training for SCR crews on Americans with Disabilities Act (ADA) specific requirements and best practices for the use of the new wheelchair lifts prior to the new equipment entering revenue service. Document the content and completion of this training.

**References:**

SSP 3.1.1 Safety Risk Identification  
49 CFR Part 270.103 (FRA)

### Safety Assurance: 4.3 Accident and Incident Investigation and Reporting

**Observation #2:** During interviews with the Superintendent of Maintenance of Way and document review, there is no evidence that SCR MOW staff and contractors have conducted annual refresher training for accident and incident reporting.

**Recommendation:**

Document requirements for which ST and partner agency positions should receive training and refresher training on ST procedures for accident and incident notification and investigation. If some individuals only require notification training and not investigation training, note this in these requirements. Document the required frequency and method of refresher training. Conduct training to ensure relevant positions have current training.

**References:**

SSP 4.3 Accident and Incident Investigation and Reporting  
49 CFR Part 270.103 (FRA)



# Appendix B: Audit Finding Risk Rating Process

To aid process owners in prioritization of the audit findings resulting from the audit, a level of audit risk will be assigned by assessing two factors: 1.) the probability that the associated problem will occur at some point in the future, and 2.) the impact or severity of that problem in relation to the overall business process.

Using the same Risk Assessment Matrix already in used throughout the agency and based on the MIL-STD-882-E; audit findings are qualitatively assessed based on the worst credible case that is anticipated from the result of human error, design inadequacies, component failure or a malfunction.

Risk Rating Scale						
	Severity	Catastrophic (1)	Critical (2)	Major (3)	Marginal (4)	Negligible (5)
Probability	Frequent (A)	High (1A)	High (2A)	High (3A)	Serious (4A)	Medium (5A)
	Probable (B)	High (1B)	High (2B)	Serious (3B)	Serious (4B)	Medium (5B)
	Occasional (C)	High (1C)	Serious (2C)	Serious (3C)	Medium (4C)	Low (5C)
	Remote (D)	Serious (1D)	Medium (2D)	Medium (3D)	Low (4D)	Low (5D)
	Improbable (E)	Medium (1E)	Medium (2E)	Low (3E)	Low (4E)	Low (5E)
	Eliminated (F)	<b>Eliminated</b>				

## Resolution Requirements

Risk Score	Risk Level	Risk Rating	Minimum Actions	Risk Acceptance / Responsibility
1A, 1B, 1C, 2A, 2B, 3A	High	Unacceptable	Stop work & immediate correction required to reduce risk.	Not Acceptable. Executive Team is informed.
1D, 2C, 3B, 3C, 4A, 4B	Serious	Undesirable	Mitigation strategy required to reduce risk within 30 days of identification of risk.	Acceptable with risk controls and monitoring. Director-level committee review and approval.
1E, 2D, 2E, 3D, 4C, 5A, 5B	Medium	Acceptable w/ review	Monitor and consider actions to further reduce risks.	Acceptable with risk controls and monitoring. Technical Level committee review and approval.
3E, 4D, 4E, 5C, 5D, 5E	Low	Acceptable	Acceptable without further mitigation. May be accepted by the business unit in coordination with Audit and Safety.	Acceptable without further mitigation. May be acceptable by the business unit with coordination with Audit and Safety.
N/A	Eliminated	Eliminated	No actions needed.	N/A

## Appendix C: Personnel Interviewed

Robin Braziel, ST Director, Commuter Rail Bus & Paratransit
Martin Young, ST Deputy Director, Commuter Rail Operations
Richard Williams, ST Manager, Commuter Rail Maintenance
Brandon Gatliff, ST Sounder Superintendent, Maintenance of Way
Chester Holland, ST Commuter Rail Mechanical Specialist
Stephen Mischuk, ST Manager, Transportation Safety & Security
Bien Mai, ST Manager, Transportation Safety & Security
Francis Schuhmann, ST Transportation Safety & Security Specialist
Nicholas George, ST Senior Transportation Safety & Security Specialist
Jason Denny, BNSF
Brian Soyk, BNSF
Tyrone Hopper, Amtrak

## Appendix D: Documents Reviewed

System Safety Program (SSP) Revision 1.0 – August 2021
Sounder SSP Review Sheet
ST Sounder Commuter Rail System Safety Program Internal Assessment 2022
Sounder Safety Goals 2021-2023, Revised Mar 2022
Sounder Operations – Safety Workshop Minutes, Apr 2022
FRA SSP Approval Letter, Dec 2021
Sounder SAIR Log, current as of Sep 2022
SCR Near Miss Report, Aug 2022
SCR Incident Report, Mar, Jun, Sep 2022
Sounder Safety Incident Notification Procedure
SCR-WI-10014-After Action Debrief, Rev 2.0 Sep 2021
SCR-SOP-10022 Sounder Incident Data Retention, Rev 1.0 Feb 2022
SCR-SOP-10017 Amtrak Mechanical Contract Oversight, Rev 1.0 Dec 2020
SCR-SOP-10010 SWI Contract Oversight, Rev 1.0 Dec 2020
SCR-SOP-10014 BNSF Contract Oversight, Rev 1.0 Dec 2020
SCR-PLN-10006 Contract Oversight Plan, Rev 2.0 Sep 2021
SCR-PLN-10002 2021-2022 Sounder Service Plan-BNSF, May 2021
Sounder Safety Monthly Report, Sep 30 - Oct 2022
Sounder Quarterly Yard Audits Q1-Q3 2022
Sounder Monthly Documentation Audit Reports, Mar – Sep 2022
Safety Inspection Report, Lakewood Sub, Sep 2021,
Safety Inspection Report, Kent/Sumner, Sep 2021,
TSS-SOP-TSS02-FRA-RPTG (Reporting), Rev 1.0 Jul 2022
TSS-SOP-TSS06-Post-Incident-Debrief, Rev 1.0 Jan 2022
TSS-SOP-TSS27-Station Safety& Security Inspections, Rev 3.0 Feb 2022
JRSC Monthly Meeting Minutes, Nov 2021 – Sep 2022
Monthly FRA Reports, Jan – Jun 2022
FRA Guide for Preparing Accident/Incident Reports, Jul 2011